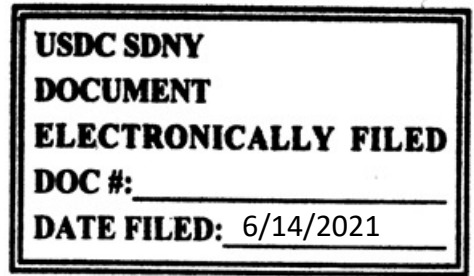


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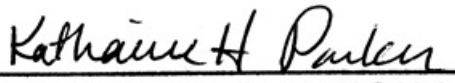
June 11, 2021

Hon. J. Paul Oetken, U.S.D.J.
Hon. Katharine H. Parker, U.S.M.J.

Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

The parties' joint application is granted. The Court hereby stays all proceedings between Plaintiffs and Equity Trust for 30 days. The parties are encouraged to submit the contemplated settlement agreement as soon as is practicable.

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

Date: June
14, 2021

Re: In re Lifetrade Litigation, Case No. 17-cv-02987 (JPO)(KHP)

Judge Oetken and Judge Parker:

We write jointly on behalf of Plaintiffs and Defendant TMF Curaçao N.V. (“Equity Trust”) in the referenced action. We are pleased to report that Plaintiffs and Equity Trust have reached consensus on elements of a contingent settlement that could resolve all claims against Equity Trust subject to, among other things, (i) the parties’ execution of a mutually-agreeable written settlement agreement, and (ii) Court approval pursuant to Fed. R. Civ. P. 23 and Fed. R. Civ. P. 23.1.¹ In light of the parties’ efforts, and to facilitate progress toward finalization of a contingent settlement, Plaintiffs and Equity Trust respectfully request that the Court stay all proceedings between them pending their submission of a settlement for Court approval, which the parties expect to do with alacrity.

As things now stand, Plaintiffs were scheduled to file their reply memorandum relating to their Motion to Amend (Dkt. 436) on Monday, June 14, 2021. In light of this stay application, Plaintiffs and Equity Trust have agreed that in the event that the Court does not agree to our proposed stay, that there will be no objection to Plaintiffs’ application to grant a brief extension of time in which to file that reply should that prove necessary.

Respectfully submitted,

/s/ Steven Phillips
Steven Phillips

/s/ Susan L. Saltzstein
Susan L. Saltzstein

¹ For the avoidance of doubt, Plaintiffs and Equity Trust agree that there is no enforceable settlement until the parties execute – and the Court approves – a formal and final written settlement agreement.

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